

**THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

DEBORAH MEREDITH,)
Plaintiff,) 1:16-cv-01102-PAG
vs.)
UNITED COLLECTION BUREAU, INC.,) Judge Gaughan
Defendant.)

PLAINTIFF'S MOTION TO COMPEL DEFENDANT TO PRODUCE CLASS DATA

Pursuant to Fed. R. Civ. P. 37, Plaintiff Deborah Meredith, by and through counsel, hereby moves this Court for an order compelling Defendant United Collection Bureau, Inc. (“UCB”) to produce those relevant portions of its database that will permit Plaintiff to identify the “wrong number” calls UCB made using its dialer or with an unattended message to Plaintiff and the class. Plaintiff understands that UCB claims that extracting the relevant data is too difficult for its technicians; for this reason Plaintiff alternatively requests that the Court order UCB to produce its entire database that includes such data and meet and confer with Plaintiff and her expert so that they may understand how the data is organized and maintained. Such information and materials are responsive to requests propounded in discovery. *See* Interrogs. 1, 6, 7 and Prod. Req. 2, 4.

The reasons supporting this motion are set forth in Plaintiff's memorandum in support and associated exhibits, filed contemporaneously with this motion.

Dated: March 15, 2017

Respectfully submitted,

DEBORAH MEREDITH

By: s/ Alexander H. Burke

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CERTIFICATE OF SERVICE

I hereby certify that, on March 15, 2017, I caused the foregoing to be electronically filed with the Clerk of the United States District Court for the Northern District of Ohio using the CM/ECF system, which will send notification of such filing to all counsel of record. Sealed materials will be sent by mail to counsel of record.

s/Alexander H. Burke